

October 6, 2023

VIA ECF

Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Franco v. 380 Second LLC, et al.*, Case No. 1:22-cv-04011-AS-JW

Dear Judge Willis:

In accordance with the Court's Order dated September 6, 2023 (Dkt. No. 81), Defendants 380 Second LLC ("380 Second") and Small Door Gramercy LLC ("Small Door" and, collectively, the "Defendants") write to advise the Court regarding the status of the construction of the permanent ramp outside of the premises at issue in this matter. We are advised by our clients that construction started earlier this week, and the plumbers are working to relocate the siamese connection. It is expected that the relocation of the siamese connection will take approximately another week to complete. Once the siamese connection has been relocated, framing and pouring of the permanent ramp will commence. In light of the progress that has been made so far, the Defendants anticipate that the permanent ramp will be completed by the end of this month.

We appreciate Your Honor's consideration of the foregoing.

Respectfully submitted

/s/Jason Mizrahi
Jason Mizrahi
Counsel for Small Door

/s/ Sean J. Kirby
Sean J. Kirby
Counsel for 380 Second

cc: All counsel of record (via ECF)